

Appendix B
List of Relevant Documents

Appendix B

List of Relevant Documents

Portions of the following documents that implement, manage, or assess institutional controls at the INEEL have been integrated into this sitewide institutional controls plan.

DOE-ID, 1992, *Record of Decision for the Test Reactor Area Perched Water System*, U.S. Department of Energy Idaho Operations Office, December 1992.

DOE-ID, 1993, *Record of Decision – Declaration for PIT 9 at the Radioactive Waste Management Complex Subsurface Disposal Area*, October, U.S. Department of Energy Idaho Operations Office, 1993.

DOE-ID, 1994a, *Record of Decision: Declaration for PAD-A at the Radioactive Waste Management Complex Subsurface Disposal Area*, February, U.S. Department of Energy Idaho Operations Office, 1994.

DOE-ID, 1994b, *Record of Decision: Declaration for Organic Contamination in the Vadose Zone, (OCVZ), RWMC*, INEL December, U.S. Department of Energy Idaho Operations Office, 1994.

DOE-ID, 1995, *Record of Decision, Declaration for the Technical Support Facility Injection Well (TSF-05) and Surrounding Groundwater Contamination (TSF-23) and Miscellaneous No Action Sites Final Remedial Action*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10139, August 1995.

DOE-ID, 1996, *Record of Decision: Stationary Low-Power Reactor-I and Boiling Water Reactor Experiment-I Burial Grounds (Operable Units 5-01, 5-03, 5-04, and 5-11)*, U.S. Department of Energy, Idaho Operations Office, January 1996.

DOE-ID, 1997, *Final Record of Decision for Test Reactor Area, Operable Unit 2-13*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10586, December 1997.

DOE-ID, 1999a, *Final Record of Decision, Idaho Nuclear Technology and Engineering Center*, DOE/ID-10660, U.S. Department of Energy Idaho Operations Office, U.S. Environmental Protection Agency, Idaho Department of Health and Welfare, October 1999.

DOE-ID, 1999b, *Final Record of Decision for Test Area North, Operable Unit 1-10*, DOE/ID-10682, October 1999.

DOE-ID, 2000a, *Record of Decision for the Power Burst Facility and Auxiliary Reactor Area, Operable Unit 5-12*, DOE/ID-10700, U.S. Department of Energy, Idaho Operations Office, January 2000.

DOE-ID, 2000b, *Explanation of Significant Differences to the Record of Decision for Test Reactor Area Operable Unit 2-13*, DOE/ID-10744, U.S. Department of Energy Idaho Operations Office, May 2000.

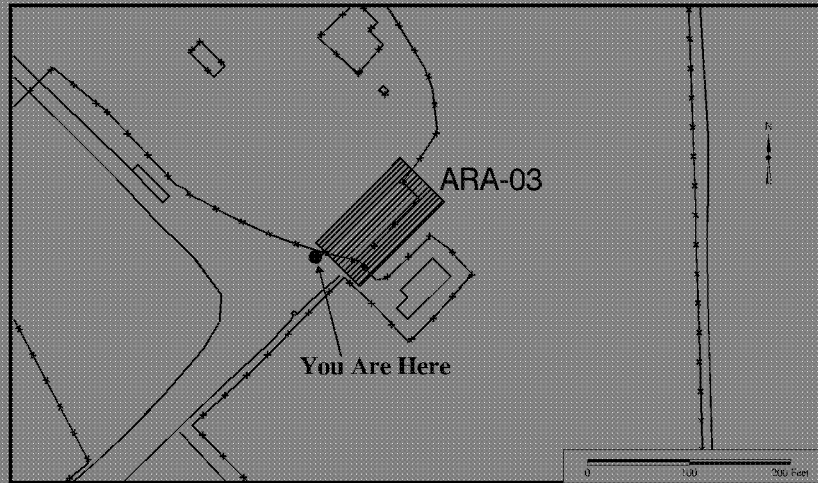
DOE-ID, 2000c, *Final Comprehensive Record of Decision for Central Facilities Area Operable Unit 4-13*, Department of Energy Idaho Operations Office, DOE/ID-10719, July 2000.

- DOE-ID, 2000d, *Operations and Maintenance Plan for Power Burst Facility and Auxiliary Reactor Area, Operable Unit 5-12*, DOE/ID-10805, U. S. Department of Energy Idaho Operations Office, December 2000.
- DOE-ID, 2001, *Record of Decision Amendment- Technical Support Facility Injection Well (TSF-05) and Surrounding Groundwater Contamination (TSF-23) and Miscellaneous No Action Sites Final Remedial Action*, U.S. Department of Energy Idaho Operations Office, DOE/ID-10139 Amendment, September 2001.
- DOE-ID, 2002a, *Record of Decision for Experimental Breeder Reactor I/Boiling Reactor Experiment Area and Miscellaneous Sites*, DOE/ID-10980, Rev. 0, U.S. Department of Energy Idaho Operations Office, November 2002.
- DOE-ID, 2002b, *Operations and Maintenance Plan for the Final Selected Remedies & Institutional Controls at Central Facilities Area Operable Unit 4-13*, DOE/ID-10931, Rev 0., U.S. Department of Energy Idaho Operations Office, March 2002.
- DOE-ID, 2002c, *The 2002 Institutional Controls Inspection, Environmental Monitoring, and Site Maintenance Report for Waste Area Group I*, DOE/ID-11011, Rev. 0, July 2002.
- DOE-ID, 2003a, *Institutional Control Plan for the Idaho Nuclear Technology and Engineering Center, Waste Area Group 3, Operable Unit 3-13*, DOE/ID-10729, Rev. 3, U.S. Department of Energy, Idaho Operations Office, January 2003.
- DOE-ID, 2003b, *Explanation of Significant Differences for the Record of Decision for the Test Area North Operable Unit 1-10*, DOE/ID-11050, Rev. 0, April 2003.
- INEEL, 1997, *Explanation of Significant Differences from the Record of Decision for the Technical Support Facility Injection Well (FSF-05) and Surrounding Groundwater Contamination (FSF-23) and Miscellaneous No Action Sites, Final Remedial Action*, INEEL/EXT-97-00931, November 1997.
- INEEL, 2000, *Institutional Control Plan for Test Area North Waste Area Group I*, INEEL/EXT-2000-00917, Rev. 0, September 2000.
- INEL, 1996, *Record of Decision for Stationary Low-Power Reactor 1 OU 5-05 & Borax I Burial Grounds OU 6-01 and 10 No Action Sites (OU 5-01, 5-03, 5-04 and 5-11)*, 1996.

Appendix C
Example of a CERCLA Warning Sign at the INEEL

CERCLA
Institutionally Controlled Area

WAG-5 ARA-03 ARA-I Lead Sheeting Pad



Contaminated Media: Soil Potential Hazards: Radionuclides

No Unauthorized Disturbances

Point of Contact: WCC (Warning Communications Center)

526-1515

03-GA50877-14

Example of a CERCLA Warning Sign

Color: Orange

Suggested Size: 12 in. x 12 in.

Appendix D
Example of Environmental Checklist

ENVIRONMENTAL CHECKLIST

EC Document No.:

DIRECTIONS: The Responsible Managers should complete Sections A through D. The Contractor's Policy and Permitting Organization completes Sections E & F (unless otherwise specified). Refer to MCP-3480 "Environmental Instructions for Facilities, Processes, Materials, and Equipment," Appendix A for instructions to complete this form.

SECTION A. Descriptive Information:

Charge Number:

Project Title:

DOE-HQ Program:

Project No.:

Contact	Name	Telephone No.	E-mail
DOE Project Technical Manager:			
Facility Operations Manager:			
Program/Project Manager:			
Project/Technical Contact:			
Alternative Project/Technical Contact:			
Environmental Field Support Contact:			

Source	Yes	No	Source	Yes	No
1. Air Pollutants	<input type="checkbox"/>	<input type="checkbox"/>	11. Industrial Waste Generation and Management	<input type="checkbox"/>	<input type="checkbox"/>
2. Asbestos Emissions	<input type="checkbox"/>	<input type="checkbox"/>	12. Interaction with Wildlife/Habitat	<input type="checkbox"/>	<input type="checkbox"/>
3. Biological Hazards	<input type="checkbox"/>	<input checked="" type="checkbox"/>	13. Managing Property and Materials	<input type="checkbox"/>	<input type="checkbox"/>
4. Chemical Use and Storage	<input type="checkbox"/>	<input type="checkbox"/>	14. PCB Contamination	<input type="checkbox"/>	<input type="checkbox"/>
5. Contaminated Sites Disturbance	<input type="checkbox"/>	<input type="checkbox"/>	15. Radioactive Materials Use and Storage	<input type="checkbox"/>	<input type="checkbox"/>
6. Cultural/Historical Resource Disturbance	<input type="checkbox"/>	<input type="checkbox"/>	16. Radioactive Waste Generation and Management	<input type="checkbox"/>	<input type="checkbox"/>
7. Discharge to Wastewater Systems or Groundwater	<input type="checkbox"/>	<input type="checkbox"/>	17. Storage of Hazardous/Rad. Materials or Waste in Tanks	<input type="checkbox"/>	<input type="checkbox"/>
8. Drinking Water Contamination	<input type="checkbox"/>	<input type="checkbox"/>	18. Surface Water and Storm Water Contamination	<input type="checkbox"/>	<input type="checkbox"/>
9. Hazardous/Mixed Waste Generation and Management	<input type="checkbox"/>	<input type="checkbox"/>	19. Use, Reuse and Recycling of Resources	<input type="checkbox"/>	<input type="checkbox"/>
10. Hazardous/Rad. Material or Waste Handling and Trans.	<input type="checkbox"/>	<input type="checkbox"/>	20. Work within areas Subject to Flooding	<input type="checkbox"/>	<input type="checkbox"/>

SECTION D. Work Activities: Select specific work activities using Appendix B in MCP-3480 and check appropriate section numbers on the Work Activity Work Sheet (see next page). Check and do one of the following:

- ☐ If required to submit EC by MCP-3480, Appendix B, do not complete Sections E & F or Signature Block. Submit EC to Environmental Management Systems and Employee Awareness Department, John S. Irving (MS 3428) or E-mail (JSI4) for review and approval.
- ☐ If not required to submit EC by MCP-3480, Appendix B, complete Sections E & F (check either "Existing EC" or "Does not require an approved EC"), sign & date (in Signature Block), and place copy of EC in project files.

SECTION E. Instructions and Conditions: (If Yes, see attachment for instructions.)

	Yes	No
1. Instructions from MCP-3480?	<input type="checkbox"/>	<input type="checkbox"/>
2. Conditions Required Before Starting Project?	<input type="checkbox"/>	<input type="checkbox"/>
CX: <input type="checkbox"/> EA: <input type="checkbox"/> EIS: <input type="checkbox"/> CERCLA: <input type="checkbox"/>	Previously approved NEPA document, including existing environmental checklist (provide # below): <input type="checkbox"/>	Does not require EC approved by Environmental Affairs (e.g., routine maintenance, operational activities): <input type="checkbox"/>

Note: For projects checked above as "CX" (Categorical Exclusion) the proposed action must not: 1) threaten a violation of applicable statutory, regulatory, or permit requirements for environmental, safety, and health, including requirements of DOE orders; 2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities; 3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases; 4) adversely affect environmentally sensitive resources. In addition, no extraordinary circumstances related to the proposal exist which would affect the significance of the action, and the action is not "connected" nor "related" (40 CFR 1508.25(a)(1) and (2), respectively) to other actions with potentially or cumulatively significant impacts.

Note: The above paragraph does not apply to EA, EIS, or CERCLA related activities.

SIGNATURE BLOCK. Signature indicates that this form is accurate and complete, to the best of my knowledge.

Printed/Typed Name	Signature	Date	Telephone No
--------------------	-----------	------	--------------

ENVIRONMENTAL CHECKLIST

Highlighted Work Activities may require submittal of an Environmental Checklist to Environmental Affairs

EC Document No : _____

<p>Asbestos</p> <p><input type="checkbox"/> 4.2 Performing Activities that may Break Up, Dislodge, Disturb or Block Access to Regulated Asbestos-Containing Material</p> <p><input type="checkbox"/> 4.3 Removing Asbestos-Containing Material</p> <p>Chemical Products/Chemicals/Hazardous Agents</p> <p><input type="checkbox"/> 4.4 Purchasing Chemical Products / Chemicals / Hazardous Agents</p> <p><input type="checkbox"/> 4.5 Using Storing and Dispositioning Chemical Products / Chemicals / Hazardous Agents</p> <p>Contaminated Areas. (Radiological, Chemical)</p> <p><input type="checkbox"/> 4.6 Working in a CERCLA Area of Contamination</p> <p>Container Storage Facilities</p> <p><input type="checkbox"/> 4.7 Constructing or Modifying Facilities that Store Oil in Containers</p> <p><input type="checkbox"/> 4.8 Operating Stationary, Portable or Mobile Facilities or Equipment that Store Oil in Containers</p> <p>Drinking Water</p> <p><input type="checkbox"/> 4.9 Constructing or Modifying Drinking Water Systems</p> <p><input type="checkbox"/> 4.10 Operating Drinking Water Systems</p> <p><input type="checkbox"/> 4.11 Sampling Drinking Water Systems</p> <p><input type="checkbox"/> 4.12 Maintaining and Repairing Drinking Water Systems</p> <p><input type="checkbox"/> 4.13 Exceeding Permitted or Regulatory Limits Drinking Water</p> <p>Facility, Equipment, &/or Process</p> <p><input type="checkbox"/> 4.14 Performing Siting Studies for New Buildings or Structures</p> <p><input type="checkbox"/> 4.15 Constructing or Modifying Facilities, Equipment, or Processes</p> <p><input type="checkbox"/> 4.16 Making Mod. to Facilities, Bldgs. or Equipment as Part of Routine Maint</p> <p><input type="checkbox"/> 4.17 Operating Facilities, Equipment, or Processes</p> <p><input type="checkbox"/> 4.18 Responding to Regulatory Inspections</p> <p><input type="checkbox"/> 4.19 Maintaining and Repairing Facilities, Processes and Equipment</p> <p><input type="checkbox"/> 4.20 Monitoring Storm Water according to the SWPPP for Industrial Activities</p> <p><input type="checkbox"/> 4.21 Manufacturing Wood Furniture and Wood Furniture Components</p> <p><input type="checkbox"/> 4.22 Removing Brake Pads</p> <p><input type="checkbox"/> 4.23 Maintaining Equipment Containing, or Contaminated with PCBs</p> <p><input type="checkbox"/> 4.24 Decontaminating Equip. Containing or Contaminated with PCBs</p> <p><input type="checkbox"/> 4.25 Preparing Buildings or Facilities being Transferred to Surplus or Placed into Standby (Inactive) Status</p> <p><input type="checkbox"/> 4.26 Reactivating Bldg. or Facilities from Standby (Inactive) Status</p> <p><input type="checkbox"/> 4.27 Deactivating, Decontaminating, Dismantling, or Closing Facilities (including Trailers), Equipment, and Processes</p> <p>Facility, Equipment and/or Processes that Emit Air Pollutants</p> <p><input type="checkbox"/> 4.28 Relocating Portable Air Emission Sources, or Bringing Portable or Stationary Air Emission Sources onto the INEEL</p> <p><input type="checkbox"/> 4.29 Constructing or Modifying Stationary Air Emission Sources</p> <p><input type="checkbox"/> 4.30 Starting Up, Shutting Down or Performing Scheduled Maintenance on Stationary Air Emissions Sources</p> <p><input type="checkbox"/> 4.31 Operating Stationary Facilities and Equipment that Emit Air Pollutants</p> <p><input type="checkbox"/> 4.32 Operating Stationary Facilities Processes and Equipment that Emit Radionuclides</p> <p><input type="checkbox"/> 4.33 Exceeding Permitted or Regulatory Limits from Stationary Air Emission Sources</p> <p><input type="checkbox"/> 4.34 Performing Activities with the Potential for Fugitive Dust or Fugitive Emissions</p> <p><input type="checkbox"/> 4.35 Conducting Open Burning</p> <p>Diesel Fuel and Gasoline Pumps</p> <p><input type="checkbox"/> 4.36 Purchasing Diesel Fuel</p> <p><input type="checkbox"/> 4.37 Maintenance and Repairing Motor Vehicle Gasoline Station Pump</p>	<p>Halon and Appliances Containing Halon</p> <p><input type="checkbox"/> 4.38 Maintaining, Testing and Disposing of Halon-Containing Equipment and Halon</p> <p>Lead</p> <p><input type="checkbox"/> 4.39 Removing Lead from Service or from a Structure, or Classifying Newly Discovered Lead</p> <p><input type="checkbox"/> 4.40 Using and Storing Product Lead</p> <p><input type="checkbox"/> 4.41 Shipping Product Lead Off-site for Direct Reuse (that is, no reclamation) at Another Facility</p> <p>Refrigerants and Appliances Containing Refrigerants</p> <p><input type="checkbox"/> 4.42 Purchasing refrigerants, appliances containing refrigerants, system components that operate using refrigerants, or refrigerant recovery or recycling equipment</p> <p><input type="checkbox"/> 4.43 Maintaining, servicing or repairing stationary heating, ventilation, air conditioning and refrigeration (HVAC) equipment</p> <p><input type="checkbox"/> 4.44 Maintaining, servicing or repairing motor vehicle air conditioners (MVAC)</p> <p><input type="checkbox"/> 4.45 Distributing, excessing or disposing of appliances containing refrigerants</p> <p>Pesticides and Fertilizers</p> <p><input type="checkbox"/> 4.46 Procuring, applying and storing pesticides</p> <p><input type="checkbox"/> 4.47 Apply fertilizers</p> <p>Procuring</p> <p><input type="checkbox"/> 4.48 Procuring goods and services</p> <p>Property</p> <p><input type="checkbox"/> 4.49 Leasing, renting, or transacting real property</p> <p>Research and Development</p> <p><input type="checkbox"/> 4.50 Conducting new, or modifying existing research and development (R&D) activities, including indoor bench-scale and small-scale R&D activities, and small-scale pilot projects</p> <p>Routine Activities</p> <p><input type="checkbox"/> 4.51 Performing routine administrative activities</p> <p>Sampling, Handling Samples and Disposing of Samples</p> <p><input type="checkbox"/> 4.98 Preparing to collect CERCLA and D&D&D samples</p> <p><input type="checkbox"/> 4.99 Collecting CERCLA and DBDD samples</p> <p><input type="checkbox"/> 4.100 Preparing to collect samples (Non-CERCLA or DBDD)</p> <p><input type="checkbox"/> 4.101 Collecting samples for analysis (Non-CERCLA or D&D&D)</p> <p><input type="checkbox"/> 4.102 Packaging and temporarily storing samples collected to obtain environmental data</p> <p><input type="checkbox"/> 4.103 Transferring samples to the laboratory</p> <p><input type="checkbox"/> 4.104 Storing and maintaining samples</p> <p><input type="checkbox"/> 4.105 Disposing of samples</p> <p><input type="checkbox"/> 4.106 Reporting CERCLA and D&D&D Characterization data</p> <p>Septic Tanks</p> <p><input type="checkbox"/> 4.52 Constructing or modifying septic tanks or systems</p> <p><input type="checkbox"/> 4.53 Discharging to septic tanks or systems</p> <p><input type="checkbox"/> 4.54 Maintaining and repairing septic tanks or systems</p> <p><input type="checkbox"/> 4.55 Pumping septic tanks and sanitary waste systems</p> <p><input type="checkbox"/> 4.56 Abandoning or closing septic tanks</p> <p>Soils - Disturbing Soil or Altering Stream Channels</p> <p><input type="checkbox"/> 4.57 Disturbing soils or altering stream channels</p> <p>Spills and Releases</p> <p><input type="checkbox"/> 4.58 Reporting and cleaning up spills and releases</p> <p><input type="checkbox"/> 4.58 Oil Spills that cannot be cleaned up within 24 hours</p> <p><input type="checkbox"/> 4.59 Cleaning up spills and releases of PCBs</p>	<p>Tanks - Aboveground (AST) & Underground (UST) Storage Tanks</p> <p><input type="checkbox"/> 4.60 Constructing or modifying ASTs and non-regulated USTs</p> <p><input type="checkbox"/> 4.61 Operating ASTs and non-regulated USTs</p> <p><input type="checkbox"/> 4.62 Repairing ASTs and non-regulated USTs</p> <p><input type="checkbox"/> 4.63 Changing use or reactivating ASTs and non-regulated USTs</p> <p><input type="checkbox"/> 4.64 Discontinuing use of, or closing, relocating, or removing ASTs and non-regulated USTs</p> <p><input type="checkbox"/> 4.65 Constructing or modifying regulated UST systems</p> <p><input type="checkbox"/> 4.66 Operating and maintaining regulated USTs</p> <p><input type="checkbox"/> 4.67 Repairing regulated USTs</p> <p><input type="checkbox"/> 4.68 Releases, leaks, spills or unusual operating conditions from regulated USTs</p> <p><input type="checkbox"/> 4.69 Changing use or reactivating regulated USTs</p> <p><input type="checkbox"/> 4.70 Temporarily discontinuing use of, or temporarily closing regulated USTs</p> <p><input type="checkbox"/> 4.71 Discontinuing use of, or closing, relocating or removing regulated USTs permanently</p> <p><input type="checkbox"/> 4.72 Operating volatile organic storage tanks</p> <p>Waste Facilities</p> <p><input type="checkbox"/> 4.73 Constructing or modifying facilities, equipment or processes at Permitted or interim status RCRA facilities</p> <p><input type="checkbox"/> 4.74 Operating solid waste management units</p> <p><input type="checkbox"/> 4.75 Discontinuing use of, or closing facilities, equipment or processes at RCRA permitted or interim status units</p> <p>Wastes</p> <p><input type="checkbox"/> 4.76 Obtaining laboratory services for EM-funded activities</p> <p><input type="checkbox"/> 4.77 Procuring off-site waste management and recycling services</p> <p><input type="checkbox"/> 4.78 Planning to generate wastes</p> <p><input type="checkbox"/> 4.79 Generating waste</p> <p><input type="checkbox"/> 4.80 Dispositioning excess materials</p> <p>Wastewater, City of Idaho Falls</p> <p><input type="checkbox"/> 4.81 Constructing or modifying sewage & other wastewater systems</p> <p><input type="checkbox"/> 4.82 Discharging new wastewaters or changing discharges to the City of Idaho Falls sewer system</p> <p><input type="checkbox"/> 4.83 Discharging wastewater to the City of Idaho Falls sewer system</p> <p><input type="checkbox"/> 4.84 Monitoring wastewater discharges to the City of Idaho Falls sewer System</p> <p><input type="checkbox"/> 4.85 Exceeding wastewater discharge limits to the City of Idaho Falls sewer System</p> <p>Wastewater, INEEL Site</p> <p><input type="checkbox"/> 4.81 Constructing or modifying sewage & other wastewater systems</p> <p><input type="checkbox"/> 4.86 Discharging new wastewaters at the INEEL Site</p> <p><input type="checkbox"/> 4.87 Discharging wastewaters at the INEEL Site</p> <p><input type="checkbox"/> 4.88 Discharging wastewaters to wastewater land application facilities</p> <p><input type="checkbox"/> 4.89 Operating wastewater land application facilities</p> <p>Water Use and Consumption</p> <p><input type="checkbox"/> 4.90 Reporting Water Consumption</p> <p>Wells - Water Wells, Injection Wells, Well Protection</p> <p><input type="checkbox"/> 4.91 Constructing or Modifying Water Wells</p> <p><input type="checkbox"/> 4.92 Protecting Wells</p> <p><input type="checkbox"/> 4.93 Closing and Abandoning Wells and Boreholes</p> <p><input type="checkbox"/> 4.94 Constructing or Modifying Injection Wells</p> <p><input type="checkbox"/> 4.95 Operating and Sampling Permitted Injection Wells</p> <p><input type="checkbox"/> 4.96 Operating Shallow Injection Wells Not Requiring a Permit</p> <p><input type="checkbox"/> 4.97 Closing or Abandoning Injection Wells</p>
---	--	--

ENVIRONMENTAL CHECKLIST

EC Document No.: _____

Environmental Checklist Attachments

Section B. Project Description (continued): Attach an accurate and concise description of the project or action. Including type of action (e.g., new construction, process modification, maintenance, new activity, research and development, or work for others), purpose and need, pollution prevention and waste minimization measures, projected start and end dates, and approximate cost.

Section C. Environmental Aspects (continued): (If you answered Yes to any Section C items, label with Section C Item Number and explain below.)

Section E. Conditions and Instructions: (Include conditions required before starting project and select applicable Work Activity Instructions from MCP-3480)

Conditions:

Instructions:

Section F. NEPA Level of Documentation and Reference(s):

Appendix E

WAG 3 OU 3-13 Soil Management Strategy

E-I. WAG 3 OU 3-13 Soil Management Strategy

This appendix presents the soil management strategy that applies to soil disturbances within the Idaho Nuclear Technology and Engineering Center (INTEC) (DOE-ID 2003). This strategy is to be applied only to WAG 3 OU 3-13. The strategy applies to soil to be managed during the institutional controls (IC) period for the facility. This strategy applies to the following eight soil groups:

1. No Further Action sites, which may be disturbed during routine maintenance and operations
2. Group 1 – Tank Farm Soil
3. Group 2 – Soil Under Buildings and Structures
4. Group 3 – Other Surface Soils
5. Group 4 – Perched Water
6. Group 5 – Snake River Plain Aquifer
7. Group 6 – Buried Gas Cylinders
8. Group 7 – SFE-20 Hot Waste Tank System.

In addition to these soil groups, other CERCLA activities may generate investigation-derived waste (IDW) that requires management (from activities supporting pre-ROD investigations pursuant to the FFNCO). Investigation-derived waste will be addressed in applicable waste management plans and monitoring systems installation plans.

The soil management strategy includes three general criteria:

1. The OU 3-13 ROD-established soil management in relation to CERCLA processes
2. Activities consistent with the OU 3-13 ROD
3. Noninterference with OU 3-13 ROD-selected remedies.

E-I.1 Applicable Definitions

For purposes of this soil management strategy, the following definitions apply:

CERCLA Site – Any site identified in the FFNCO, including those listed in the OU 3-13 ROD and those established for OU 3-14.

CERCLA Activity – An activity determined through the soil management strategy as being consistent with FFNCO programs and/or OU 3-13 ROD-established remedies.

Group 3 Site Similarity – Sites having similar soil characteristics and similar contaminants of potential concern (COPCs) as Group 3 soils.

Institutional Controls – Institutional controls as applied to the soil management strategy is defined as the management of soil/debris that does not exhibit contamination levels above those

established for No Further Action sites in the OU 3-13 ROD. Management of this material includes replacement of excavated soil/debris into a disturbed area.

RCRA Closure – Any unit subject to the closure requirements of 40 CFR 264, Subpart G, or 40 CFR 265, Subpart G.

SSSTF/ICDF Candidate – Soil/debris not returned to a disturbance area as a result of CERCLA activities that may be staged and subsequently managed in the Staging, Storage, Sizing, and Treatment Facility (SSSTF), if necessary, with ultimate disposal in the INEEL CERCLA Disposal Facility (ICDF).

Unexpected Contamination – Material disturbed beyond the boundary of a CERCLA site exceeding established field-screening levels (i.e., Group 3 Remediation Goals).

E-1.2 Regulatory Determinations

The INTEC facility has multiple regulatory requirements, including that of the Hazardous Waste Management Act (HWMA 1983), some of which overlap in jurisdiction. This was recognized during the FFNCO negotiation and the OU 3-13 ROD development. To limit the duplication of regulatory requirements, defining language was included in the both the FFNCO (DOE-ID 1991) and the OU 3-13 ROD (DOE-ID 1999). The language agreed upon within the FFNCO is

“This Agreement integrates the U.S. DOE’s CERCLA response obligations and RCRA and HWMA corrective action obligations at INEL which relate to release(s) of hazardous substances covered by this Agreement. Compliance with activities required by this Agreement will be deemed to: achieve compliance with CERCLA, 42 U.S.C. §9601, et seq.; satisfy the corrective action requirements of Sections 3004(u) and (v) of RCRA, 42 U.S.C. §§ 6924(u) and (v), for a RCRA permit, and Section 3008(h), 42 U.S.C. § 6928(h), for interim status facilities; satisfy the corrective action requirements of HWMA; and meet or exceed all applicable or relevant and appropriate federal and state laws and regulations to the extent required by Section 121 of CERCLA, 42 U.S.C. § 9621.

Based upon the foregoing, the Parties intend that any response action selected, implemented, and completed under this Agreement will be protective of human health and the environment such that remediation of releases covered by this Agreement shall obviate the need for further response action under federal or state law.””

The language agreed upon within the OU 3-13 ROD is (DOE-ID 1999):

“The ROD also recognizes that contaminated soil sites addressed under this ROD may be disturbed through maintenance or upgrade activities associated with INTEC operations during the period before the CERCLA remedies are fully implemented. These contaminated soils will be considered CERCLA remediation waste, as the removal and subsequent storage or disposal of any contaminated soil represents progress toward cleanup.”^b

a. FFA/CO Sections 5.1 and 5.2.

b. OU 3-13 ROD pg. 11-13, Description of Selected Remedies.

As indicated by the language given in the enforceable documents, this soil management strategy recognizes that soil/debris resulting from CERCLA activities will be managed under ICs for soil having contamination levels below OU 3-13 ROD-established remediation goals or as SSSTF/ICDF candidate material.

The SSSTF/ICDF Complex consists of landfills, surface impoundment(s), chemical and physical treatment, and storage and staging activities as created under the OU 3-13 ROD for the sole purpose of managing CERCLA wastes within the INEEL boundaries. This is described in both the Declaration and in Sections 9.3 and 11.1.3 of the OU 3-13 ROD, as well as the associated administrative record. On-Site activities are described to include wastes generated from CERCLA actions specifically described under OU 3-13 and at other noncontiguous facilities“within the INEEL boundaries, specifically at other waste area groups (WAGs) and operable units (OUs), e.g., Group 3 soil under OU 3-13 or contaminated soil from OU 1-10. CERCLA wastes generated within the INEEL boundary and identified for management in the ICDF under a National Contingency Plan (NCP) authorized action are, therefore, considered to be “on-site” as that term is described at 40 CFR 300.400 (e)(1). This on-Site management in the SSSTF/ICDF Complex is limited to CERCLA removal actions authorized by DOE, EPA- and DOE-signed and State of Idaho-concurred CERCLA RODs specifying on-Site remedial action, and SSSTF/ICDF secondary wastes and IDW pursuant to the Agencies-approved work plans under the December 1991 FFNCO. Wastes generated from DOE operational activities are excluded from management in the SSSTF/ICDF Complex unless there is a written Agencies decision identifying such action as encompassed by a ROD-based remedial activity or a FFA/CO-approved investigation work plan.

Figure E-1 depicts the process for soil and debris management resulting from CERCLA activities that will be encountered within OU 3-13.

1.2.1 No Action Sites and No Further Action Sites

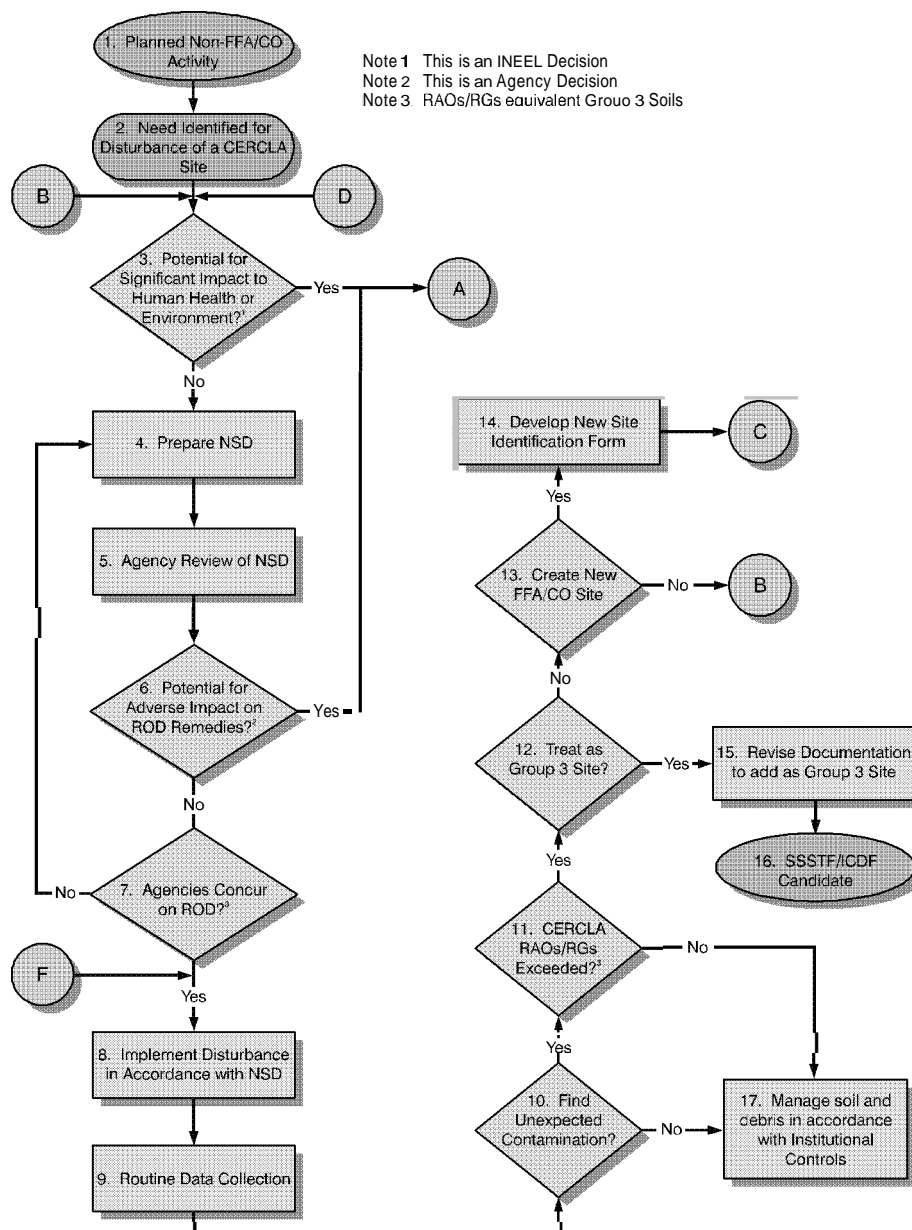
The No Action Sites are not considered CERCLA soils.

The No Further Action Sites are considered remediation sites during the institutional control period. If a soil disturbance occurs within a No Further Action Site, the soil will be managed in accordance with Figure E-1, with ultimate disposal to the ICDF, if required as a result of exceeding remediation goals.

1.2.2 Group I—Tank Farm Soil

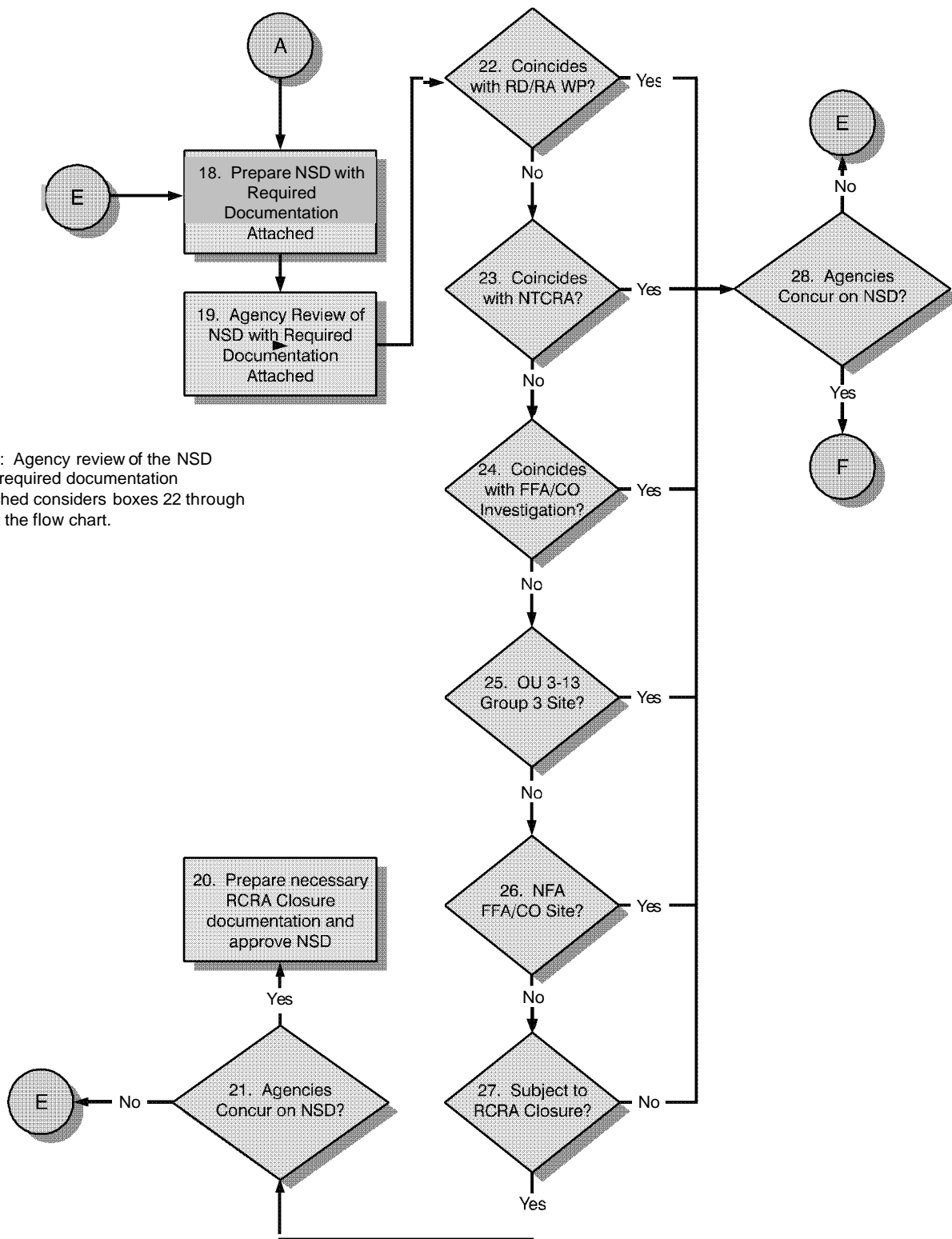
Tank farm interim action soil is associated with the Group 1 remedial actions, such as the run-on diversion channels and surface sealing the tank farm soil. Excess soil generated prior to the installation of the polyurea liner will be staged within the tank farm fence and potentially used for grading during the interim action. Staged soil will be subject to ALARA principles regarding exposure. Soil exhibiting excessive radiological hazards may not be used for grading. Soil disturbance within the tank farm after liner installation and liner maintenance conducted prior to OU 3-14 remedial action (approximately 2007) will be conducted according to the Group 1 operations and maintenance plan (to be prepared).

c. See 55 FR 46, March 8, 1990, for a discussion of noncontiguous facilities



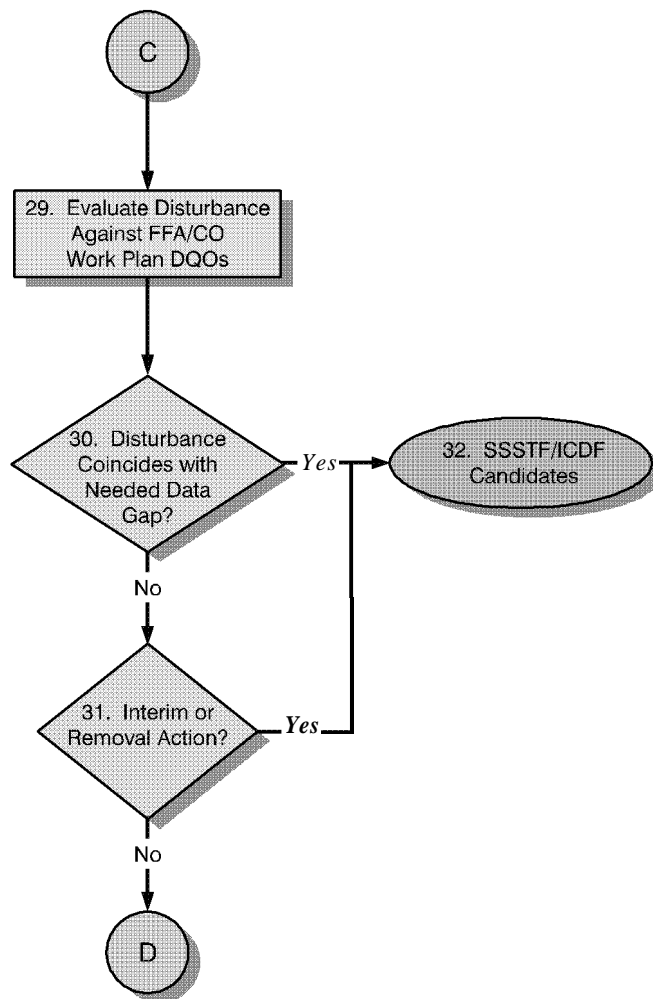
GA03-50426-10

Figure E-1. Managing soil and debris under the OU 3-13 ROD.



GA03-50426-11

Figure E-1. (continued).



GA03-50426-12

Figure E-1. (continued).

1.2.3 Group 2 Soil—Soil Under Buildings and Structures

Some of the sites listed in Group 2 may extend beyond structures and buildings. If a soil disturbance occurs where the site extends beyond the building, the soil will be managed per the soil management strategy flowchart (Figure E-1). Additionally, following completion of a deactivation, decontamination, and decommissioning (DD&D) activity, disturbed exposed soil will be managed per the soil management flowchart (Figure E-1).

1.2.4 Group 3 Soil—Other Surface Soil

The selected remedy for Group 3 soil is disposal on-Site at the ICDF. Sites disturbed prior to the construction of the ICDF will be managed within the CERCLA area of contamination (DOE-ID 1999). Short-term risks and contaminant migration will be managed according to a Group 3 waste management plan (to be prepared).

1.2.5 Group 4—Perched Water

Remediation-derived waste, such as drill cuttings, will be managed according to the Group 4 Monitoring System and Installation Plan (DOE-ID 2000).

1.2.6 Group 5—Snake River Plain Aquifer

Remediation-derived waste, such as drill cuttings, will be managed according to the Group 5 Monitoring System and Installation Plan (DOE-ID 2002).

1.2.7 Group 6—Buried Gas Cylinders

If, during the removal of the buried gas cylinders, soil above the remediation goals is encountered, the soil will be managed per the soil management flowchart (Figure E-1).

1.2.8 Group 7—SFE-20 Hot Waste Tank

The ROD remedial action for this unit involves removing the hot waste tank. Soil from the tank remedial action will have to be excavated. This soil will be considered other debris and disposed of in the ICDF unless it cannot meet the Waste Acceptance Criteria (WAC), in which case it will be disposed of off-Site along with other components that cannot meet the WAC (DOE-ID 1999).

The attachment to this appendix is an example of the Notification of Soil Disturbance approval package to document soil disturbances at the INTEC.

E-2. REFERENCES

- 40 CFR 264, Subpart G, 2001, "Closure and Post-Closure," *Code of Federal Regulations*, Office of the Federal Register, July 2001.
- 40 CFR 265, Subpart G, 2001, "Closure and Post-Closure," *Code of Federal Regulations*, Office of the Federal Register, July 2001.
- 40 CFR 300, 2002, "National Oil and Hazardous Substances Pollution Contingency Plan," *Code of Federal Regulations*, Office of the Federal Register, July 2002.
- 42 USC § 6901 et seq., 1976, "Resource Conservation and Recovery Act (Solid Waste Disposal Act)," *United States Code*, 1976.
- 42 USC § 9601 et seq., 1980, "Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA/Superfund)," *United States Code*, 1980.
- DOE-ID, 1991, *Federal Facility Agreement and Consent Order for the Idaho National Engineering Laboratory*, U.S. Department of Energy, U.S. Environmental Protection Agency Region 10, Idaho Department of Health and Welfare, Administrative Docket No. 1088-06-120, December 9, 1991.
- DOE-ID, 1999, *Final Record of Decision, Idaho Nuclear Technology and Engineering Center*, DOE/ID-10660, Rev. 0, U.S. Department of Energy Idaho Operations Office, U.S. Environmental Protection Agency, Idaho Department of Health and Welfare, October 1999.
- DOE-ID, 2000, *Monitoring System and Installation Plan for Operable Unit 3-13, Group 4, Perched Water Well Installation*, DOE/ID-10774, Rev. 0, U.S. Department of Energy Idaho Operations Office, September 2000.
- DOE-ID, 2002, *Monitoring System and Installation Plan for Operable Unit 3-13, Group 5, Snake River Plain Aquifer*, DOE/ID-10782, Rev. 2, U.S. Department of Energy Idaho Operation Office, July 2002.
- DOE-ID, 2003, *Institutional Control Plan for the Idaho Nuclear Technology and Engineering Center, Waste Area Group 3, Operable Unit 3-13*, DOE/ID-10729, Rev. 3, U.S. Department of Energy, Idaho Operations Office, January 2003.
- HWMA, 1983, "Hazardous Waste Management Act of 1983," Idaho Code Sections 39-4401 et seq., 1983.

ATTACHMENT – EXAMPLE OF APPROVAL PACKAGE

The following is an example of a Notification of Soil Disturbance approval package to document soil disturbances at the INTEC.

Agency Approval Form

The Department of Energy, Environmental Protection Agency Region 10, and the State of Idaho have completed a review of the referenced information for soil disturbance notification number **WAG 3-OU3-13-NSD-YY-XX**. This review is to determine if the stated disturbance will interfere with the conduct of planned remedial activities pursuant to the FFA/CO. Based on this review, the parties have issued approval for this soil disturbance under agreement that the following conditions will be in effect:

- A. Non-soil waste (e.g., PPE) generated at the point of excavation will be managed under RCRA regulations.
- B. Soils disturbed in CPP-88 will be sampled for Cs-137, per the sampling direction in this NSD. Soils containing CS-137 in excess of 23 pCi/g will be managed as CERCLA waste.
- C. No sampling is required for soils disturbed in sites to be remediated (i.e., Group 2, 3, 6, or 7 sites). Excavated soil will be returned to the excavations in the same manner as excavated, as these sites will be remediated at a later date.
- D. Soils disturbed at Group 1 sites will be returned to the excavations in the same manner as excavated with no sampling. No RGs have been identified for Group 1 sites pending the OU 3-14 ROD.
- E. If excess soil is generated at a site that exceeds RGs or if ALARA concerns prevent soils from being returned to the excavation, then the soils will be managed as CERCLA waste. The soils will require characterization to ensure that they meet the WAC of the ICDF for management and/or disposal. The excess soils will require characterization to ensure that they meet the waste acceptance criteria for the ICDF for management and/or disposal.
- F. Activity will be completed prior to start of remedial construction activities.
- G. Pre- and postexcavation radiological contamination data will be available to the Agencies.
- H. If during the activities unusual or unexpected conditions or contamination is discovered, the Agencies will be notified

DOE OU 3-13 manager	_____	_____
		Date
EPA OU 3-13 manager	_____	_____
		Date
IDEQ OU 3-13 manager	_____	_____
		Date

Notice of Soil Disturbance Form

1. Requestor _____
2. Classification ☐ Emergency ☐ Maintenance ☐ Projects
3. Affected CERCLA area(s) _____
4. CERCLA area description including type of contaminants know or suspected _____
5. Activity/disturbance description. Include discussion of the material (e.g., soil, structures, equipment, or debris) to be disturbed, placed within, or removed from a WAG 3 institutionally controlled area _____
6. Anticipated time period of activity _____
7. How much soil disturbance is anticipated? (% , yd³, etc.) _____
8. Maximum depth of excavation _____
9. Will proposed activity interfere with the conduct of other planned remedial activities and/or remediation strategies? _____
10. Map showing area of the anticipated disturbance ☐ Attached ☐ Not attached

SAMPLING EVALUATION (This section to be completed by the WAG 3 PE)

1. The in situ gamma spectrometer (or approved equivalent) or laboratory analyzed samples shall be used to determine the radionuclide contamination levels if required. Soil that exceeds the RG will be managed as CERCLA waste and fully characterized for management at the ICDF.
2. Cs-137 will be used as the indicator to determine if soil complies with the WAG 3 remedial goal if required.
3. The number of samples/surveys/sampling locations for screening is _____.
4. Sample and/or survey data will be reported to the WAG 3 PE or designee.
5. If unexpected conditions/levels of contamination are encountered, the requestor shall notify the WAG 3 PE, who will notify the Agencies. Follow-on action such as biased sampling or submittal of a CERCLA new site identification form to the Agencies may be required.

Additional requirements/conditions for sampling or performing surveys include _____.

REVIEW OF PACKAGE

Requestor	_____	_____
	NSD requestor	Date
Reviewer	_____	_____
	WAG 3 PE	Date
Reviewer	_____	_____
		Date
Reviewer	_____	_____
		Date

NSD PACKAGE TRANSMITTED TO THE AGENCIES BY

WAG 3 PE or designee: _____ Date: _____

Example

NSD number _____

NSD requestor _____

NSD transmitted to Agencies _____ Date _____

NSD approval date _____

Activity Startup _____

Total amount of soil disturbed _____

Results of sampling/surveys documented _____ Date _____

Disposition of disturbed soil _____

Excess soil generated? _____

Borrow soil required? _____

Volume _____

Source _____

All activities in this NSD complete? _____ Date _____

Appendix F

Assessment Guidance and Example Checklist

F-1. ASSESSMENT GUIDANCE AND EXAMPLE CHECKLIST

General description of activities that should take place before field assessment:

1. Review current IC plan, CFLUP, well maintenance reports, and last assessment report.
2. Prepare checklists and photo log for current assessment.
3. Review MCP-3562, "Hazard Identification, Analysis, and Control of Operational Activities," Review the applicable JSA for inspection of institutional controls.
4. Prepare and submit INEEL Field Work Visitation Form (#150.04) when inspections are scheduled outside of security fenced areas.
5. Obtain work authorization form area authority by placing inspection on POD/POW. Check with facility prior to beginning work.
6. Review work scope in area to determine if radiological controlled areas need to be assessed. If radiological controlled areas are accessed, then contact the appropriate RADCON organization. With the RCO's assistance, determine applicable radiological work permit (RWP) for tours/inspections and read/sign on RCIMS or as directed by the covering RCO. Sign in and out as required by the RWP. Participate in prejob briefing if required. Follow permit conditions for compliance with RWP.

Inspector	Title	Signature

The above signatures certify that information contained on this form is true and accurate to the best of the individual's knowledge.

1. Warning notices: Yes No NA
 Signs visible: Yes No NA comment: _____
 Signs located as required: Yes No NA comment: _____
 Signs legible/information correct: Yes No NA comment: _____
 Contact number(s): Yes No NA comment: _____
 Boundary monuments: Yes No NA comment: _____
2. Access Controls:
 Public access controlled: Yes No NA comment: _____
 Physical barriers (e.g., fences/gates): Yes No NA comment: _____
 Work control packages: Yes No NA comment: _____
 Radiation Work Permits: Yes No NA comment: _____
 Security access controls: Yes No NA comment: _____
3. Land use controls: Yes No NA comment: _____
4. Review of CFLUP:
 Site in CFLUP: Yes No NA comment: _____

Observation:

IMPROVEMENTS:

Describe any additional IC requirements that may be necessary due to unique circumstances observed during the visual inspection: _____

Take photographs of deficiencies and fill out the site inspection photo log for the project file.

Appendix G

Example Outline for the Annual Assessment Report

G-1. Example Outline for Annual Assessment Report

The following is an example outline for the annual assessment report documenting the effectiveness of ICs. The report should concentrate on presenting a thorough summary of the assessment and on reporting exceptions. The final outline of each report will be determined at the time of report preparation.

- I. Introduction
 - a. Purpose of document
 - b. Content of document
- 11. Assessment Summary/Results
 - a. Overall summary of assessment
 - b. Status of CFLUP
 - C Summary of well assessments
 - d. Summary of WAG 1 IC sites
 - e. Summary of WAG 2 IC sites
 - f. Summary of WAG 3 IC sites
 - g. Summary of WAG 4 IC sites
 - h. Summary of WAG 5 IC sites
 - i. Summary of WAG 7 IC sites
 - j. Summary of WAG 6/10 IC sites

The results of the assessment will be summarized for each WAG for a calendar year. In addition, the status of corrective actions identified in the previous assessment will be addressed, as well as reporting deficiencies identified during the current assessment (i.e., the format of observation of the deficiencies, the corrective action with the forecast completion date, and current status of corrective action). The report may include an appendix with summary tables for all sites listed, including individual wells. There is no intention to provide copies of the individual well and IC site checklists. The checklists will be available for review by the agency representatives at INEEL. Photographs will be maintained in the project file for viewing by agency representatives, but will not be routinely included in the annual report. Photographs may be included when the photo is indicative of a situation that could not be explained without it.

111. Summary Evaluation

This section presents the overall summary of the effectiveness of the ICs.

IV. Recommendations

This section presents recommendations on improving the implementation of the ICs and addresses any site-specific or sitewide issues.